## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF NEW YORK

KEVIN O'NEIL,

CV: 3:17-cv-640 (TJM/DEP)

Plaintiff,

-against-

NOTICE OF REMOVAL

ARGON MEDICAL DEVICES, INC. and REX MEDICAL, L.P.,

Defendants.

## TO THE JUDGES OF THE UNITED STATES DISTRICT COURT FOR THE **NORTHERN DISTRICT OF NEW YORK:**

Defendants, Argon Medical Devices, Inc. ("Argon") and Rex Medical, L.P., ("Rex"), through their counsel Segal McCambridge Singer & Mahoney, Ltd., hereby remove this action from the State of New York Supreme Court, County of Broome, to the United States District Court for the Northern District of New York, pursuant to 28 U.S.C. §§ 1332, 1441, and 1446, et seq.

Dated: New York, New York June 15, 2017

Respectfully submitted,

Howard A. Fried

Howard A. Fried, Esq. (NDNY Bar # 507243)

Walter H. Swayze, III, Esq. (Admission Pro Hac Vice to be sought)) Megan E. Grossman, Esq. (Admission Pro Hac Vice to be sought)

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